

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

MIDAS GREEN TECHNOLOGIES, LLC,

Plaintiff,

v.

Civil Action No. 6:22-CV-00050-ADA

RHODIUM ENTERPRISES, INC., *et al.*,

Defendant.

NOTICE OF JOINT STIPULATION TO MODIFY DEADLINES

Pursuant to the Court’s Amended Standing Order Regarding Joint or Unopposed Request to Change Deadlines, dated March 7, 2022, Plaintiff Midas Green Technologies, LLC (“Midas”) and Defendants Rhodium Enterprises, Inc., Rhodium Technologies LLC, Rhodium 10mw LLC, Rhodium 2.0 LLC, Rhodium 30mw LLC, Rhodium Encore LLC, Rhodium Renewables LLC, Rhodium Renewables Sub LLC, and Rhodium Ready Ventures LLC (“Rhodium Defendants”) (collectively, “Parties”) hereby jointly notify the Court of the Parties’ stipulation to extend the deadlines to serve opening and rebuttal expert reports.

Due to scheduling conflicts, the Parties have agreed to conduct the depositions of (i) Chase Blackmon; (ii) Cameron Blackmon; (iii) Jim Koen; (iv) Chris Boyd; (v) Kenneth Tooke; (vi) Michael Rainone; and (vii) Green Revolution Cooling after the close of fact discovery and before December 16, 2023. To accommodate these depositions, the Parties have agreed to extend the deadline to serve opening expert reports up to and including December 22, 2023, and the deadline to serve rebuttal expert reports up to and including January 26, 2024.

These extensions will not extend the deadline for any final submission that affects the

Court's ability to hold a hearing, trial, or other Court date nor will these extensions change the date of any hearing, trial, or other Court date. Finally, these extensions will not require any other modifications to the Court's schedule.

CURRENT DEADLINE	NEW DEADLINE	EVENT
December 11, 2023		Deadline to Produce Documents Pursuant to Federal Subpoena on Third-Party Bitmain, Inc.
December 11, 2023		Deadline to Produce Documents Pursuant to Federal Subpoena on Third-Party Canaan, Inc..
December 11, 2023		Deadline to Produce Documents Pursuant to Federal Subpoena on Third-Party DCX USA, LLC
December 11, 2023		Deadline to Produce Documents Pursuant to Federal Subpoena on Third-Party MicroBT Whatsminer.
December 11, 2023		Deadline to Produce Documents Pursuant to Federal Subpoena on Third-Party Bixbit USA, Inc.
December 15, 2023	December 22, 2023	Opening of expert reports
January 19, 2024	January 26, 2023	Rebuttal expert reports

Dated: December 1, 2023

Respectfully submitted,

/s/ Joseph E. Thomas

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Attorneys for Rhodium Defendants

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record are being served with a true and correct copy of this document via the Court's CM/ECF system on December 1, 2023.

/s/ Melissa R. Smith

Melissa R. Smith